FEDERAL DISTRICT COURT FOR WESTERN WASHINGTON

PIERCE COUNTY REPUBLICAN PARTY,

Case No. 3:25-cv-05251-BHS

Plaintiff,

v.

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REPLY TO DEFENDANT CROWL'S RESPONSE TO MOTION FOR FINDING OF CONTEMPT AND AWARD OF ATTORNEY FEES

ERIC CROWL, et. al.

Defendant.

COMES NOW PLAINTIFF PIERCE COUNTY REPUBLICAN PARTY, by and through their counsel of record Conner Edwards, and respectfully submits this REPLY TO DEFENDANT CROWL'S RESPONSE TO MOTION FOR FINDING OF CONTEMPT AND AWARD OF ATTORNEY FEES.

I. REPLY

Defendant Crowl's response is without merit for the following reasons.

First, On July 14, 2025, I (Plaintiff's Counsel Conner Edwards) both called and texted Defendant Crowl at his phone number (253) 228-6036 to provide him with the address to send payment to. Defendant Crowl answered and then hung up. I was also able to leave a voicemail. This indicates that my number was not blocked. I also called Defendant Crowl using another number and Defendant Crowl hung up.

REPLY TO DEFENDANT CROWL'S RESPONSE TO MOTION FOR FINDING OF CONTEMPT AND AWARD OF ATTORNEY FEES- 1

Second, the letter with Defendant Crowl claims was sent on July 20, 2025, was not received by me. This indicates that the letter was probably never actually sent and that the letter is a trick by Defendant Crowl to deceive the Court to make it appear as if he is complying.

Finally, regardless of whether Defendant Crowl actually sent the letter as he claimed, Defendant Crowl had an obligation to make sure that payment was made within 30 days following the order. The address of the Pierce County Republican Party is clearly present on its website and is also readily findable via a Google search. The address was also repeatedly conveyed to Defendant Crowl. Defendant Crowl also could have simply mailed the check to the address listed for Plaintiff's counsel (people mail checks to PO Boxes all the time without issue). Defendant Crowl did none of these things and instead disobeyed the plain language of the Court's order.

Mr. Crowl: Please immediately send payment of the \$265 to 10209 Bridgeport Way SW #C-1, Lakewood, WA 99499 and we will withdraw our request to hold you in contempt.

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REPLY TO DEFENDANT CROWL'S RESPONSE TO MOTION FOR FINDING OF CONTEMPT AND AWARD OF ATTORNEY FEES- 2

II. CONCLUSION 1 2 For the foregoing reasons, we respectfully request that the Court GRANT our MOTION 3 FOR FINDING OF CONTEMPT AND AWARD OF ATTORNEY FEES. 4 DATED this August 12, 2025 5 CG EDWARDS PLLC 6 7 8 Conner Edwards, WSBA No. 62961 Attorney for PLAINTIFF PIERCE COUNTY REPUBLICAN PARTY 9 10 **CERTIFICATE OF SERVICE** 11 I certify that I mailed a copy of the foregoing REPLY TO DEFENDANT CROWL'S RESPONSE TO MOTION FOR FINDING OF CONTEMPT AND AWARD OF 12 ATTORNEY FEES and accompanying documents to DEFENDANT ERIC CROWL, at 10002 112th St SW, Lakewood, WA 98498, postage prepaid. 13 14 August 12, 2025 **Date** 15 16 17 Conner Edwards, WSBA No. 62961 18 Attorney for PLAINTIFF PIERCE COUNTY REPUBLICAN PARTY 19 20 21 22 23 24 25 26

REPLY TO DEFENDANT CROWL'S RESPONSE TO MOTION FOR FINDING OF CONTEMPT AND AWARD OF ATTORNEY FEES- 3